

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**ALDO VERA, JR., as Personal  
Representative of the Estate of Aldo Vera,  
Sr.,**

**Plaintiff,**

**v.**

**THE REPUBLIC OF CUBA**

**Defendant,**

**v.**

**DEUTSCHE BANK TRUST COMPANY  
AMERICAS,**

**Garnishee.**

**12 Civ. 1596 (AKH)**

**PLAINTIFF'S MEMORANDUM IN  
RESPONSE TO THE MOTION TO  
INTERVENE, CROSS MOTION TO  
STAY, AND OBJECTION TO  
TURNOVER OF INTERVENORS  
NATIONAL BANK OF CANADA  
AND NATIONAL BANK  
FINANCIAL GROUP**

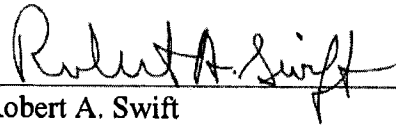
Plaintiff Aldo Vera, Jr. (the "Movant"), by his undersigned attorneys, submits this Memorandum of Law in response to the Cross Motion to Intervene and Stay (ECF # 137) and Opposition Memorandum submitted by National Bank of Canada ("RBC") and National Bank Financial Group ("NBFG"). (ECF # 140)

Intervenors sole claim as an "interested party" is as to Deutsche Bank Trust Company Americas Account No. 4860278. Plaintiff has contemporaneously filed with this Court a withdraw of his Writ of Execution, Restraining Notice and Turnover Motion as regards Account No. 4860278 only. Accordingly, Intervenors' motion to intervene, motion to stay and objections to the Turnover Motion are moot.

Dated: New York, New York  
April 8, 2013

Respectfully submitted,

KOHN, SWIFT & GRAF, P.C.

A handwritten signature in cursive script, reading "Robert A. Swift", written over a horizontal line.

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